

UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF PENNSYLVANIA

UNITED STATES OF AMERICA

v.

ROBERT L. HAYES, SR.
Defendant.

NO. 19-cr-139.

(JUDGE *Acus.*)

INDICTMENT

THE GRAND JURY CHARGES:

COUNT ONE

(Possession of Child Pornography)
(18 U.S.C. § 2252A(a)(5)(B))

FILED
HARRISBURG, PA

APR 17 2019

Per

ADD
Deputy Clerk

On or about October 16, 2018, within the Middle District of
Pennsylvania,

ROBERT L. HAYES, SR.

knowingly possessed and caused to be possessed, images of child
pornography, as defined in Title 18, U.S.C. § 2256, depicting minors,
including prepubescent minors under the age of 12, engaged in sexually
explicit conduct, that had been mailed, shipped or transported in
interstate or foreign commerce by any means, including by computer,
and was produced using materials that had been mailed, shipped or

transported in interstate or foreign commerce by any means, including
by computer.

In violation of Title 18, United States Code, Section 2252A
(a)(5)(B), (b)(2).

THE GRAND JURY FURTHER CHARGES:

COUNT TWO
(Possession of Child Pornography)
(18 U.S.C. § 2252A(a)(5)(B))

On or about November 20, 2018, within the Middle District of Pennsylvania,

ROBERT L. HAYES, SR.

knowingly possessed and caused to be possessed, images of child pornography, as defined in Title 18, U.S.C. § 2256, depicting minors, including prepubescent minors under the age of 12, engaged in sexually explicit conduct, that had been mailed, shipped or transported in interstate or foreign commerce by any means, including by computer, and was produced using materials that had been mailed, shipped or transported in interstate or foreign commerce by any means, including by computer.

In violation of Title 18, United States Code, Sections 2252A (a)(5)(B), (b)(2).

A TRUE BILL


FOREPERSON, GRAND JURY

DAVID J. FREED
UNITED STATES ATTORNEY

BY: *Meredith A. Taylor*
MEREDITH A. TAYLOR
ASSISTANT U.S. ATTORNEY

4-17-19
DATE